

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NALCO COMPANY,)	
a Delaware corporation,)	
)	
Plaintiff/Counter-Defendant,)	
)	Case No. 07 C 6293
v.)	
)	Judge Hart
ENVIRO TECH CHEMICAL SERVICES,)	Magistrate Judge Cox
INC.,)	
a California corporation,)	
)	
Defendant/Counter-Plaintiff.)	

AGREED MOTION TO EXTEND DISCOVERY

Defendant, Enviro Tech Chemical Services, Inc. ("Enviro Tech"), with the agreement of Plaintiff Nalco Company, respectfully requests that the Court extend the time for written discovery to August 30, 2008.

1. In its January 16, 2008 Order, this Court held that written discovery be completed by April 30, 2008. At the status hearing on that date, the Court stated that written discovery should be completed before depositions have begun.

2. At the April 16, 2008 status conference, this Court extended the written discovery to June 30, 2008. While the parties expect that all discovery responses and initial document productions will be completed by the June 30, 2008 written discovery cutoff, rather than begin depositions, the parties seek an additional two months to fully review the documents, and consider and discuss potentially narrowing the issues, and whether alternative dispute resolution would be productive. The additional time is also necessary because the main counsel for Defendant, Enviro Tech needs to have some significant unexpected surgery.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court extend the time for written discovery to August 30, 2008.

ENVIRO TECH CHEMICAL SERVICES,
INC.

NALCO COMPANY

By: s/ Suzanne M. Wallman

By: s/ Joseph H. Herron

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2008, I electronically filed the foregoing AGREED MOTION TO EXTEND DISCOVERY with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

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